



Department of Energy

Richland Field Office

P.O. Box 550

Richland, Washington 99352

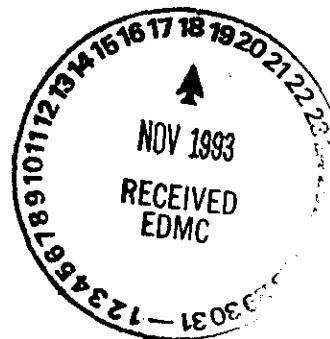
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93-RPS-213

JUN 25 1993

Ms. Dana Rasmussen
Regional Administrator
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Ms. Mary Riveland, Director
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Ms. Rasmussen and Ms. Riveland:

HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION

The U.S. Department of Energy, Richland Operations Office (RL) (owner/operator), and its contractors (co-operators), the Westinghouse Hanford Company (WHC) and the Pacific Northwest Laboratory (PNL), hereby submit, with this letter, the "Hanford Facility Dangerous Waste Permit Application, General Information" (Document DOE/RL-91-28, Rev. 1 [Enclosure]). This document supersedes the document entitled, "Hanford Facility Dangerous Waste Permit Application" (Document DOE/RL-91-28, Rev. 0) submitted to the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) on October 3, 1991. Consistent with Revision 0, the scope of Revision 1 covers only those treatment, storage, and/or disposal (TSD) units for which final status is sought.

The "Hanford Facility Dangerous Waste Permit Application" is a single application organized into a General Information Portion (this document, DOE/RL-91-28, Rev. 1) and a TSD Unit-Specific Portion, which includes documentation for individual TSD units. In satisfaction of the Hanford Federal Facility Agreement and Consent Order (FFACO) Milestone M-20 schedule, Part B permit application documentation has been submitted for several Hanford Facility TSD units. Upon written notification of completeness from EPA and Ecology, one or more of these final, certified documents along with Document DOE/RL-91-28, Rev. 1 constitute a complete Dangerous Waste Permit Application meeting all requirements of the FFACO, 40 CFR 270.1(c)(4), and WAC 173-303-806.

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This "Hanford Facility Dangerous Waste Permit Application, General Information" (DOE/RL-91-28, Rev. 1) submittal contains information current as of March 15, 1993. This document revision also contains information consistent with the "Hanford Site Comments on the Draft Permit for the Treatment, Storage, and Disposal of Dangerous Waste for the Hanford Facility" (Hanford Site Comments) which were submitted to Ecology and EPA on March 16, 1992. As noted in these Hanford Site Comments, we consider that the intent of the FFACO is that the initial Hanford Facility Permit be issued for one or more individual TSD units for which the application is complete, while all other TSD units on the Hanford Facility would continue to be regulated under interim status requirements. Activities and areas outside of TSD units would not be subject to coverage. This approach is consistent with that expressed in correspondence transmitted to Ecology and EPA on August 28, 1990, September 18, 1991, October 3, 1991, and March 12, 1992.

Once the initial "Hanford Facility Dangerous Waste Permit" is issued, the following process will be used. As final, certified TSD unit-specific documents are developed, and completeness notifications are made by EPA and Ecology, additional unit-specific permit conditions will be incorporated into the "Hanford Facility Dangerous Waste Permit" through the permit modification process.

Currently, RL is considering the need to pursue acquiring separate EPA/State identification (ID) numbers for generating and/or TSD activities that are conducted on land that is not contiguous with the Hanford Facility. Any changes that may be related to separate ID numbers are not reflected in Document DOE/RL-91-28, Rev. 1. If this approach is pursued, the necessary notifications for separate EPA/State ID numbers will be submitted per WAC-173-303-060. Subsequent Hanford Facility Dangerous Waste Permit Application revisions will reflect this change, if implemented.

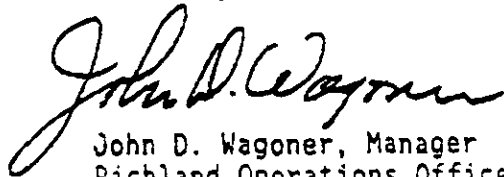
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RL, WHC, and PNL remain fully supportive of the timely issuance of a permit that is consistent with the regulatory provisions and the agreement of the parties to the FFACO, and will continue to work with you in achieving that goal. Should you have further questions regarding the contents of this letter or the enclosure, please contact Mr. J. E. Rasmussen of RL on (509) 376-5441, Mr. H. E. McGuire of WHC on (509) 376-1400, or Dr. T. D. Chikalla of PNL on (509) 376-2239.

Sincerely,


John D. Wagoner, Manager
Richland Operations Office


T. M. Anderson, President
Westinghouse Hanford Company


W. R. Wiley, Director
Pacific Northwest Laboratory

Enclosure

cc: D. Butler, Ecology, w/o encl.
R. Carosino, RL, w/o encl.
G. Chou, EM-322, w/o encl.
- C. Clark, RL, w/o encl.
M. Crosland, EM-5, w/o encl.
D. Duncan, EPA, w/encl.
G. Hofer, EPA, w/encl.
T. Michelena, Ecology, w/encl.
D. Nylander, Ecology, w/encl.
S. Price, WHC, w/o encl.
D. Ruge, GC-11, w/o encl.
J. Schumann, EM-5, w/o encl.
D. Sherwood, EPA, w/encl.
C. Sikorski, EPA, w/encl.
R. Stanley, Ecology, w/encl.
H. Tilden, PNL, w/o encl.
S. Woodbury, EH-22, w/o encl.

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